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Sinking Fund Commission*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☒ Affects Both Debtors
☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF THE CITY OF
PHILADELPHIA SINKING FUND
COMMISSION TO SECURITIES LEAD
PLAINTIFF'S OBJECTION TO
REORGANIZED DEBTORS' MOTION TO
APPROVE SECURITIES ADR AND
RELATED PROCEDURES FOR
RESOLVING SUBORDINATED
SECURITIES CLAIMS [D.I. 9189]**

1 The City of Philadelphia Sinking Fund Commission, the holder of a Securities Claim¹
2 and a creditor in the chapter 11 bankruptcy cases (the “**Chapter 11 Cases**”) of the above-
3 captioned reorganized debtors (the “**Debtors**”, or as reorganized pursuant to the Plan, the
4 “**Reorganized Debtors**”), by and through its undersigned counsel, submits this joinder
5 (“**Joinder**”) to *Securities Lead Plaintiff’s Objection to Reorganized Debtors’ Motion to Approve*
6 *Securities ADR and Related Procedures for Resolving Subordinated Securities Claims* [Docket
7 No. 9189] (the “**Securities ADR Objection**”), in opposition to *Reorganized Debtors’ Motion to*
8 *Approve Securities ADR and Related Procedures for Resolving Subordinated Securities Claims*
9 [Docket No. 8964] (the “**Securities ADR Motion**”). In support of this Joinder, the City of
10 Philadelphia Sinking Fund Commission, respectfully states as follows:
11

12 **JOINDER AND RESERVATION OF RIGHTS**
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14 1. The City of Philadelphia Sinking Fund Commission is a Securities Claimant and
15 timely filed proofs of claim against the Debtors by the Extended Bar Date (Claim Nos.
16 QBCKL27423 and YGWJD27423).

17 2. The City of Philadelphia Sinking Fund Commission incorporates by reference and
18 hereby joins in all arguments set forth in the Securities ADR Objection.

19 3. The City of Philadelphia Sinking Fund Commission reserves its right to supplement
20 this Joinder and further reserves its rights to participate in any hearing to consider the Securities
21 ADR Motion, including its rights to make any arguments and to examine witnesses.
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26 ¹ Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as
28 applicable.

1 **CONCLUSION**

2 For all of the foregoing reasons, the City of Philadelphia Sinking Fund Commission
3 respectfully requests that this Court enter an Order denying the Securities ADR Motion and
4 granting such other and further relief as may be just and proper.
5

6 Dated: October 6, 2020

BARRACK, RODOS & BACINE

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